

HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STUART REGES,

*Plaintiff,*

v.

ANA MARI CAUCE, et al.,

*Defendants.*

CASE NO. 2:22-cv-00964-JHC

**STIPULATED MOTION AND  
ORDER TO AMEND PLAINTIFF'S  
COMPLAINT**

NOTE ON MOTION CALENDAR:  
July 17, 2023

As permitted by Federal Rule of Civil Procedure 15(a)(2), LCR 7(d)(1), LCR 10(g), LCR 15, and the Court's Minute Order Setting Trial Date and Related Dates, ECF No. 39, Plaintiff Stuart Reges ("Plaintiff") and Defendants Ana Mari Cauce, Nancy Allbritton, Magdalena Balazinska, and Daniel Grossman ("Defendants"), by and through their undersigned counsel, submit this Stipulated Motion to Amend Plaintiff's Complaint. In support of this motion, the parties state that:

**WHEREAS** on July 13, 2022, Plaintiff, Professor Stuart Reges, filed his Complaint for Civil Rights Violations in this action against the Defendants;

**WHEREAS** Plaintiff seeks to file his proposed Amended Complaint, which adds newly discovered facts and prayers for relief related to prospective injunctive

1 relief and damages;

2       **WHEREAS** a copy of Plaintiff's proposed Amended Complaint is attached as  
3 Exhibit A, and that copy strikes through the text to be deleted and underlines the  
4 text to be added, in compliance with LCR 15;

5       **WHEREAS** Federal Rule of Civil Procedure 15(a)(2) provides that "a party  
6 may amend its pleading only with the opposing party's written consent or the court's  
7 leave" and that "the court should freely give leave when justice so requires";

8       **WHEREAS** Defendants give their written consent, by and through  
9 undersigned counsel, for Plaintiff to amend his Complaint;

10       **WHEREFORE, the Parties hereby jointly request**, by and through their  
11 respective undersigned counsel, that:

- 12       1. The Court grant leave to Plaintiff to file his proposed Amended Complaint  
13       and serve it upon all parties via the CM/ECF system within fourteen (14)  
14       days of the entry of this Stipulated Motion and its accompanying Order;
- 15       2. Defendant's responsive pleading be due thirty (30) days after the Amended  
16       Complaint is filed and served.

17 DATED: July 17, 2023

18 By: /s/ James M. Diaz  
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*Attorneys for Defendants*

1 Pursuant to the foregoing Stipulated Motion to Amend Plaintiff's Complaint,  
2 **IT IS HEREBY ORDERED** that Plaintiff, Stuart Reges, is granted leave to file and  
3 to serve upon all parties via CM/ECF his Amended Complaint, a struck-through and  
4 underlined copy of which is attached as Exhibit A, within fourteen (14) days of entry  
5 of this Order.

6 **IT IS FURTHER ORDERED** that Defendants' responsive pleading or motion  
7 shall be due thirty (30) days after the Amended Complaint is filed and served.

8  
9 IT IS SO ORDERED.

10 Dated: July 18, 2023

A handwritten signature in black ink, reading "John H. Chun", is written over a horizontal line.

Hon. John H. Chun  
United States District Court Judge

**CERTIFICATE OF SERVICE**

Plaintiff's counsel confirms that a true and correct copy of the foregoing was served by the Court's electronic filing system on July 17, 2023. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated below and parties may access this filing through the Court's electronic filing system.

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*Attorneys for Defendants*

Dated: July 17, 2023

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